IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MAACO ENTERPRISES, INC. : CIVIL ACTION NO.: 02-4012

381 Brooks Road :

King of Prussia, PA 19406

:

vs.

:

ELISA M. CARRERA DEL MORAL and
LA GRAN MAQUINA, INC.
RD #2, Kilometer 165.2

Hormigueros, PR 00660 :

PLAINTIFF MAACO ENTERPRISES, INC.'S OPPOSITION TO LA GRAN MAQUINA, INC.'S MOTION IN OPPOSITION TO ENTRY OF DEFAULT

Because La Gran Maquina, Inc. ("LGMI") is a corporation and a corporation may not appear *pro se* in matters before this Court, plaintiff Maaco Enterprises, Inc. ("Maaco") respectfully requests that the Court disregard the relief requested by LGMI in its Motion in Opposition to Entry of Default. To the extent the Court considers LGMI's Motion, Maaco responds as follows:

- 1. Denied as stated. On October 21, 2002, Julio A. Olivieri served a copy of a summons and complaint in this matter.
- 2. Denied. The summons and complaint were served personally on Julio Carrera, president of defendant LGMI.
- 3. Denied. Plaintiff is without information sufficient to form a belief as to the allegations set forth in this paragraph and, therefore, the allegations are denied.
- 4. The Rule is in writing and speaks for itself. Service was effected by serving Mr. Carrera, president of LGMI.
 - 5. The Rule is in writing and speaks for itself. Service was effected by serving Mr.

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Carrera, president of LGMI.

6. Denied. "Automax" was not served with a copy of the Summons and Complaint.

Julio Carrera, president of LGMI, was served with a copy of the Summons and Complaint.

7. Denied. Mr. Carrera was served with copies of the Summons and Complaint

which were legible and provided defendant with sufficient notice of this action and of the claims

asserted by Maaco.

WHEREFORE, plaintiff Maaco Enterprises, Inc. respectfully requests that defendant

LGMI's Motion be denied and that judgment be entered against defendant in accordance with the

relief sought by Maaco, together with such other further relief as the Court may deem proper.

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Enterprises, Inc.

Dated: January 9, 2003